

ADVERSARY PROCEEDING COVER SHEET (Instructions on Reverse)		ADVERSARY PROCEEDING NUMBER (For Court Use Only)	
PLAINTIFFS Angela Dawn Dyches 21901 US Hwy 301 N Statesboro, GA 30461		DEFENDANTS Title Max of Georgia, Inc. 190 Northside Dr., E. Statesboro, GA 30458	
ATTORNEYS (Firm Name, Address, and Telephone No.) Evelyn S. Hubbard 373325 Evelyn S. Hubbard, Atty at Law 106 E. Ogeechee Street P.O. Box 1704 Sylvania, GA 30467-1407 912-564-7421 Fax: 912-564-2746		ATTORNEYS (If Known)	
PARTY (Check One Box Only) <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> U.S. Trustee/Bankruptcy Admin <input type="checkbox"/> Creditor <input type="checkbox"/> Other <input type="checkbox"/> Trustee		PARTY (Check One Box Only) <input type="checkbox"/> Debtor <input type="checkbox"/> U.S. Trustee/Bankruptcy Admin <input checked="" type="checkbox"/> Creditor <input type="checkbox"/> Other <input type="checkbox"/> Trustee	
CAUSE OF ACTION (WRITE A BRIEF STATEMENT OF CAUSE OF ACTION, INCLUDING ALL U.S. STATUTES INVOLVED)			
NATURE OF SUIT (Number up to five (5) boxes starting with lead cause of action as 1, first alternative cause as 2, second alternative cause as 3, etc.)			
FRBP 7001(1) - Recovery of Money/Property <input checked="" type="checkbox"/> 11-Recovery of money/property - §542 turnover of property <input type="checkbox"/> 12-Recovery of money/property - §547 preference <input type="checkbox"/> 13-Recovery of money/property - §548 fraudulent transfer <input type="checkbox"/> 14-Recovery of money/property - other FRBP 7001(2) - Validity, Priority or Extent of Lien <input type="checkbox"/> 21-Validity, priority or extent of lien or other interest in property FRBP 7001(3) - Approval of Sale of Property <input type="checkbox"/> 31-Approval of sale of property of estate and of a co-owner - §363(h) FRBP 7001(4) - Objection/Revocation of Discharge <input type="checkbox"/> 41-Objection / revocation of discharge - §727(c),(d),(e) FRBP 7001(5) - Revocation of Confirmation <input type="checkbox"/> 51-Revocation of confirmation FRBP 7001(6) - Dischargeability <input type="checkbox"/> 66-Dischargeability - §523(a)(1),(14),(14A) priority tax claims <input type="checkbox"/> 62-Dischargeability - §523(a)(2), false pretenses, false representation, actual fraud <input type="checkbox"/> 67-Dischargeability - §523(a)(4), fraud as fiduciary, embezzlement, larceny (continued next column)		FRBP 7001(6) - Dischargeability (continued) <input type="checkbox"/> 61-Dischargeability - §523(a)(5), domestic support <input type="checkbox"/> 68-Dischargeability - §523(a)(6), willful and malicious injury <input type="checkbox"/> 63-Dischargeability - §523(a)(8), student loan <input type="checkbox"/> 64-Dischargeability - §523(a)(15), divorce or separation obligation (other than domestic support) <input type="checkbox"/> 65-Dischargeability - other FRBP 7001(7) - Injunctive Relief <input type="checkbox"/> 71-Injunctive relief - imposition of stay <input type="checkbox"/> 72-Injunctive relief - other FRBP 7001(8) Subordination of Claim or Interest <input type="checkbox"/> 81-Subordination of claim or interest FRBP 7001(9) Declaratory Judgment <input type="checkbox"/> 91-Declaratory judgment FRBP 7001(10) Determination of Removed Action <input type="checkbox"/> 01-Determination of removed claim or cause Other <input type="checkbox"/> SS-SIPA Case - 15 U.S.C. §78aaa et seq. <input type="checkbox"/> 02-Other (e.g. other actions that would have been brought in state court if unrelated to bankruptcy case)	
<input type="checkbox"/> Check if this case involves a substantive issue of state law		<input type="checkbox"/> Check if this is asserted to be a class action under FRCP 23	
<input type="checkbox"/> Check if a jury trial is demanded in complaint		Demand \$	
Other Relief Sought			

BANKRUPTCY CASE IN WHICH THIS ADVERSARY PROCEEDING ARISES		
NAME OF DEBTOR Angela Dawn Dyches		BANKRUPTCY CASE NO. 14-60525-EJC
DISTRICT IN WHICH CASE IS PENDING Southern District of Georgia	DIVISION OFFICE Statesboro	NAME OF JUDGE Edward J. Coleman
RELATED ADVERSARY PROCEEDING (IF ANY)		
PLAINTIFF	DEFENDANT	ADVERSARY PROCEEDING NO.
DISTRICT IN WHICH ADVERSARY IS PENDING	DIVISION OFFICE	NAME OF JUDGE
SIGNATURE OF ATTORNEY (OR PLAINTIFF)		
/s/ Evelyn S. Hubbard		
Evelyn S. Hubbard 373325		
DATE 10/01/2014	PRINT NAME OF ATTORNEY (OR PLAINTIFF) Evelyn S. Hubbard 373325	

INSTRUCTIONS

The filing of a bankruptcy case creates an "estate" under the jurisdiction of the bankruptcy court which consists of all of the property of the debtor, wherever that property is located. Because the bankruptcy estate is so extensive and the jurisdiction of the court so broad, there may be lawsuits over the property or property rights of the estate. There also may be lawsuits concerning the debtor's discharge. If such a lawsuit is filed in a bankruptcy court, it is called an adversary proceeding.

A party filing an adversary proceeding must also must complete and file Form 104, the Adversary Proceeding Cover Sheet, unless the party files the adversary proceeding electronically through the court's Case Management/Electronic Case Filing system (CM/ECF). (CM/ECF captures the information on Form 104 as part of the filing process.) When completed, the cover sheet summarizes basic information on the adversary proceeding. The clerk of court needs the information to process the adversary proceeding and prepare required statistical reports on court activity.

The cover sheet and the information contained on it do not replace or supplement the filing and service of pleadings or other papers as required by law, the Bankruptcy Rules, or the local rules of court. The cover sheet, which is largely self-explanatory, must be completed by the plaintiff's attorney (or by the plaintiff if the plaintiff is not represented by an attorney). A separate cover sheet must be submitted to the clerk for each complaint filed.

Plaintiffs and Defendants. Give the names of the plaintiffs and defendants exactly as they appear on the complaint.

Attorneys. Give the names and addresses of the attorneys, if known.

Party. Check the most appropriate box in the first column for the plaintiffs and the second column for the defendants.

Demand. Enter the dollar amount being demanded in the complaint.

Signature. This cover sheet must be signed by the attorney of record in the box on the second page of the form. If the plaintiff is represented by a law firm, a member of the firm must sign. If the plaintiff is pro se, that is, not represented by an attorney, the plaintiff must sign.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF GEORGIA

In re	<u>Angela Dawn Dyches</u>)	Case No.	<u>14-60525-EJC</u>
	Debtor)		
	<u>Angela Dawn Dyches</u>)	Chapter	<u>13</u>
	Plaintiff)		
)		
	v.)	Adv. Proc. No.	
	<u>TitleMax of Georgia, Inc.</u>)		
	Defendant)		

COMPLAINT TO RECOVER VEHICLE

Comes now ANGELA DAWN DYCHES, Debtor in the above styled action and files this Complaint to Recover Vehicle showing the Court the following:

1.

TitleMax of Georgia, Inc. repossessed a 2005 Toyota Camry automobile on September 29, 2014. Debtor filed a Chapter 13 Bankruptcy on October 1, 2014.

2.

Debtor needs the vehicle in order to work, go to her doctor's appointments and to provide transportation for her and her child.

3.

The plan provides for payment of the debt to TitleMax of Georgia, Inc. in full. Creditor will not be harmed by returning the vehicle to Debtor.

WHEREFORE, Debtor requests that the Court enter an order authorizing the Creditor to return the vehicle to the Debtor.

Respectfully submitted,

/s/ Evelyn S. Hubbard
Evelyn Hubbard

Evelyn S. Hubbard
P O Box 1704
Sylvania, GA 30467
912 5645 7421
Bar# 373325

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF GEORGIA**

In re	<u>Angela Dawn Dyches</u>	,)	Case No.	<u>14-60525-EJC</u>
	Debtor)		
	<u>Angela Dawn Dyches</u>)	Chapter	<u>13</u>
	Plaintiff)		
)		
	v.)	Adv. Proc. No.	<u> </u>
	<u>TitleMax of Georgia, Inc.</u>)		
	Defendant)		

CERTIFICATE OF SERVICE

I hereby certify that on October 1, 2014 a copy of the Adversary Proceeding Cover Sheet was served electronically or by regular United States mail to all interested parties, the Trustee and all creditors listed below:

O. Byron Meredith, III
PO Box 10556
Savannah, GA 31412

TitleMax of Georgia, Inc.
109 Northside Dr., E
Statesboro, GA 30458

/s/ Evelyn S. Hubbard
Evelyn S. Hubbard 373325
106 E. Ogeechee Street
PO Box 1704
Sylvania, GA 30467
Phone: (912) 564-7421
Fax: (912) 564-2746

UNITED STATES BANKRUPTCY COURT
Southern District of Georgia

In the matter of:

ANGELA DAWN DYCHES

Chapter: 13

vs.

TITLEMAX OF GEORGIA, INC.

Case No.: 14-60525

Adversary Proceeding No.:

DISCLOSURE STATEMENT
S.D. Ga LR 7.1.1

The undersigned, counsel of record for ANGELA DAWN DYCHES certifies that the following is a full and complete list of the parties in this action:

<u>Name</u>	<u>Identification and Relationship</u>
ANGELA DAWN DYCHES	PLAINTIFF/DEBTOR
TITLEMAX OF GEORGIA, INC.	DEFENDANT/CREDITOR

The undersigned further certifies that the following is a full and complete list of officers, directors, or trustees of the above-identified parties:

<u>Name</u>	<u>Identification and Relationship</u>
O. BYRON MEREDITH, III	TRUSTEE

The undersigned further certifies that the following is a full and complete list of other persons, firms, partnerships, corporations, or organizations that have a financial interest in, or another interest which could be substantially affected by, the outcome of this case (including a relationship as parent or holding company or any publicly-held corporation that holds 10% or more of a party's stock):

<u>Name</u>	<u>Identification, Relationship and Interests</u>
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Dated: 10/01/2014By: s/ EVELYN S. HUBBARDAttorney Name: EVELYN S. HUBBARDPO BOX 1704

Address

SYLVANIA

City

GA

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30467

Zip

912-564-7421

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373325

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